

ITEM:

SUBJECT: Spanish Flat Water District, Monticello Cemetery District, and Napa County, Spanish Flat Wastewater Treatment and Disposal System – Napa County

BOARD ACTION: *Consideration of Approval of Revised Monitoring and Reporting Program*

BACKGROUND: The Spanish Flat wastewater treatment facility is regulated by Waste Discharge Requirements Order No. 93-236. The WDRs were adopted in 1993, and allow a monthly average discharge of 25,000 gallons per day of domestic wastewater. The wastewater is treated to secondary standards prior to storage and disposal in a percolation/evaporation pond. During the summer, wastewater is also occasionally used to spray irrigate a disposal field and/or the Monticello Cemetery.

Older WDRs often contain outdated Monitoring and Reporting Programs (MRPs), requiring such minimal monitoring that staff cannot determine if a discharger is complying with the prohibitions and specifications of its WDRs. It has been staff's practice to review and revise MRPs as necessary. In the case of this Discharger, the 1993 MRP was outdated, and following an inspection in July 2004, staff prepared a draft revised MRP which included (among other items) a time schedule for the installation and sampling of groundwater monitoring wells. Following review and comment by the Discharger, the revised MRP was signed by the Executive Officer in March 2005.

ISSUES: The Discharger has not installed the wells and recently requested a Board Hearing to discuss this issue. The Discharger believes that groundwater monitoring should not be required at this site because only domestic waste is discharged and because the cost of wells would create a "negative economic impact" to the homeowners.

This item was scheduled for the 4 May 2006 meeting of the Regional Water Board. However, based on discussions between Regional Water Board staff (staff), the Discharger, and their attorney, the item was not heard. The Discharger indicated that they had recently retained a professional geologist and requested that staff meet with their geologist at the site to determine if groundwater monitoring wells could be installed around the primary wastewater pond and to identify possible locations for the wells. Staff informed the Discharger that if the requirements of the Third Revision to the MRP could not be met, it would be scheduled for either the August or September 2006 meeting of the Regional Water Board.

Staff then met with the Discharger's geologist from Napa County Public Works at the site on 17 May 2006 to discuss potential groundwater monitoring well locations around the primary wastewater pond and have determined several possible well locations including using one of three recently installed wells (drilled to approximately 35 feet below ground

surface) at the Spanish Flat Maintenance Yard located southwest of the wastewater storage pond. Groundwater in these wells range from approximately 14 to 16 feet below ground surface.

The Discharger stated in a 1 July 2006 letter that the groundwater monitoring requirement in the Third Revised MRP was not appropriate and that the water quality in the pond is good enough to be used for irrigation purposes and will not cause groundwater contamination. The Discharger also indicated that the installation and sampling of the groundwater monitoring wells would significantly increase their operating costs with no benefit to their customers.

The Discharger requested another meeting with staff, and on 30 August 2006 staff conducted a conference call with the Discharger, its attorney and two geologists to discuss the groundwater monitoring requirements in the Third Revised MRP. Staff informed the Discharger that if they could not accept the Revised MRP, the item would be placed on the contested calendar for the 21/22 September meeting of the Regional Water Board. The Discharger stated that they would get back to staff. No response has been received as of the date of this staff report.

Groundwater monitoring is necessary at this site in order to determine whether the Discharger is complying with its Groundwater Limitation (which states that the discharge cannot degrade groundwater). The majority of the waste is disposed of through an unlined percolation/evaporation pond. The pond sits on a ridge above Lake Berryessa, a source of drinking water for the Spanish Flat subdivision, as well as other housing areas and resorts around the lake. Staff estimates that the cost to install three wells around the pond is approximately \$14,000 with quarterly monitoring and reporting costs of approximately \$3,700. The requirement to install groundwater monitoring wells at this site is consistent with other WDRs, enforcement orders, and revised MRPs adopted since 2000, which commonly require groundwater monitoring for those sites that discharge domestic wastewater to land. Groundwater monitoring has shown that at some sites, the discharge of domestic waste has adversely impacted groundwater.

**RECOMMENDATION:**

Regional Board staff have prepared a third revised MRP providing extended timelines for the installation and monitoring of groundwater wells at this facility, and ask that the Regional Board approve the MRP.

Mgmt. Review \_\_\_\_\_  
Legal Review \_\_\_\_\_

**21/22 September 2006**

Central Valley Regional Water Quality Control Board meeting  
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Rancho Cordova, CA 95670